

FILED

SEP 13 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:19 MJ 386 DDN
)	
ROLAND MCKINNEY,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Sayler Fleming Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with one count of Possession with Intent to Distribute Controlled Substances in violation of Title 21, United States Code, Section 841(a).

2. As alleged in the Affidavit supporting the Complaint, on September 7, 2019, at approximately 12:46 am, uniformed SLMPD officers assigned to the Sixth District were on patrol in the area of North Newstead Avenue and Natural Bridge Avenue when they were flagged down by a citizen who alerted them to a female lying in the street near the intersection of North Newstead Avenue and Lee Avenue in the City of St. Louis, within the Eastern District of Missouri. Upon arrival, officers located the female S.M. lying in the street. S.M. was unconscious and suffering

from gunshot wounds to the abdomen. S.M. succumbed to her injuries at the scene and was pronounced deceased by responding medical personnel.

4. Investigators located surveillance video which depicted the murder of S.M. and determined that the suspect was occupying the driver's seat of dark sports utility vehicle. Additionally, investigators received information from S.M.'s family member(s) that they heard the suspect responsible for the murder is named "Roland".

5. Investigators located and gathered additional information from a nearby license plate recognition system which produced images of the suspect vehicle and its license plate (Missouri license plate DS9B9P). A computer search of the license plate revealed it is issued on a 2008 Dodge Nitro to Tosha Ceaser and Roland McKinney. Investigators placed the vehicle wanted for Murder 1st Degree.

6. On September 10, 2019, SLMPD officers located the wanted Dodge Nitro driving in the area of West Florissant Avenue and Shreve Avenue. The Dodge Nitro stopped on its own accord at or near 4712 Carter Avenue, located in the City of Saint Louis within the Eastern District of Missouri. The driver, and sole occupant of the vehicle, was identified as defendant and detained. Defendant had approximately two-thousand dollars in United States currency in his possession at the time of his detention. Defendant's vehicle was towed to the SLMPD Crime Laboratory and secured pending a search warrant.

7. A computer check of Defendant revealed he has prior drug related arrest(s) and at least three prior felony convictions for Trafficking Drugs 2nd Degree from the City of St. Louis in Cause Numbers 22971-3758, 22981-611A, and 22991-4083 for which Defendant was sentenced to twenty (20) years in the Missouri Department of Corrections. During an interview with

homicide investigators, Defendant advised he was driving the Dodge Nitro at the approximate time of S.M.'s murder, but denied killing S.M.. Defendant was ultimately released after his interview pending further investigation.

8. On September 11, 2019, investigators executed a search warrant, which was issued by the Honorable Madeline Connolly of the 22nd Judicial Circuit, on Defendant's 2008 Dodge Nitro. A search by investigators of the driver's compartment of the Dodge Nitro located, among other things, suspected cocaine base packaged in plastic bags. Investigators also located a quantity of cocaine base which was not packaged in plastic bags. Additionally, paperwork belonging to Defendant, as well as his cellular telephone, were located inside the 2008 Dodge Nitro.

9. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant, the defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.

10. There is a serious risk that the defendant will flee.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Saylor Fleming
SAYLER FLEMING #58775MO
Assistant United States Attorney